

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**
Reading Division

IN RE:
DEIDRE LEE PATTERSON

Case No. 22-11464-pmm
Chapter 13

Nationstar Mortgage LLC,
Movant

vs.

DEIDRE LEE PATTERSON,
Debtor

**OBJECTION TO CONFIRMATION
OF DEBTOR'S CHAPTER 13 PLAN**

Nationstar Mortgage LLC ("Movant"), by and through its undersigned counsel, files this *Objection to Confirmation of Debtor's Chapter 13 Plan* (Doc 15), and states as follows:

1. The Debtor filed a voluntary petition pursuant to Chapter 13 of the Bankruptcy Code on June 6, 2022.
2. Movant holds a security interest in the Debtor's real property located at 927 Vernon St, Bethlehem, PA 18015 (the "Property"), by virtue of a Mortgage which is recorded as instrument Number 2014024540 in Official Records of Northampton County, Pennsylvania. Said Mortgage secures a Note in the amount of \$92,102.00.
3. The Debtor filed a Chapter 13 Plan (the "Plan") on June 20, 2022 (Doc 15).
4. The Plan states in Part 4(b) that Movant will receive distribution in the amount of \$86,000.00 from the Chapter 13 Trustee on its pre-petition arrears.
5. Although Movant has not yet filed its proof of claim, it is anticipated that the claim

will show the pre-petition arrearage due Movant is \$88,087.52. Therefore, the Plan is not in compliance with the requirements of 11 U.S.C. §§ 1322(b)(3) and 1325(a)(5) and cannot be confirmed.

6. Movant objects to any plan which proposes to pay it anything less than \$88,087.52 as the pre-petition arrearage over the life of the plan.

WHEREFORE, Movant respectfully requests the entry of an Order which denies confirmation of the Plan unless such plan is amended to overcome the objections of Movant as stated herein, and for such other and further relief as the Court may deem just and proper.

/s/Andrew Spivack

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Nationstar Mortgage LLC, Movant	
vs.	
DEIDRE LEE PATTERSON, Debtor	

CERTIFICATE OF SERVICE

I, the undersigned, hereby certify that a true and exact copy of the foregoing Objection To Confirmation Of Debtor's Chapter 13 Plan has been electronically served or mailed, postage prepaid on this day to the following:

DEIDRE LEE PATTERSON
927 VERNON ST
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August 4, 2022

/s/Andrew Spivack

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